

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
 : **Case No.: 22-10824**
Shanyel M. Little : **Chapter 13**
Marcus A. Little : **Judge Magdeline D. Coleman**
Debtor(s) : *********

**OBJECTION OF AJAX MORTGAGE LOAN TRUST 2019-E, MORTGAGE-BACKED
SECURITIES, SERIES 2019-E, BY U.S. BANK NATIONAL ASSOCIATION, AS
INDENTURE TRUSTEE TO CONFIRMATION OF THE AMENDED PLAN
(DOCKET NUMBER 19)**

Ajax Mortgage Loan Trust 2019-E, Mortgage-Backed Securities, Series 2019-E, by U.S. Bank National Association, as Indenture Trustee ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Amended Chapter 13 Plan ("Plan") filed by Shanyel M. Little and Marcus A. Little (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 3059 N Bambrey Street, Philadelphia, PA 19132-1302 ("Property").
2. Creditor intends to file a Proof of Claim in the amount of \$55,756.25. This amount includes a pre-petition arrearage in the amount of \$20,869.31.
3. The Plan's proposed treatment of Creditor's claim is unclear, and it does not provide for the arrearage due on Creditor's claim.
4. Debtor's Plan therefore represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)

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Attorneys for Creditor
The case attorney for this file is Adam B.
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CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection of Ajax Mortgage Loan Trust 2019-E, Mortgage-Backed Securities, Series 2019-E, by U.S. Bank National Association, as Indenture Trustee to the Confirmation of the Amended Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

Michael A. Latzes, Attorney for Shanyel M. Little and Marcus A. Little, efiling@mlatzes-law.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Shanyel M. Little, 4949 Mulberry Street, Philadelphia, PA 19124

Marcus A. Little, 604 Wellfleet Drive, Middletown, DE 19709

City of Philadelphia, Law Department - Tax unit 1401 John F. Kennedy Blvd., 5th Floor,
Att'n: Bankruptcy Department, Philadelphia, PA 19102-1595

Water Revenue Bureau, 1401 J.F.K. Blvd., Attn: Bankruptcy Dept., Philadelphia, PA 19102-1663

/s/ Adam B. Hall